



September 9, 2013

MEMO ENDORSED

VIA ECF

The Honorable Denise L. Cote
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1610
New York, New York 10007-1312

The redactions are
approved.
Denise Cote
9/11/13

Re: FHFA Actions, No. 11-cv-5201, et al. (DLC) (S.D.N.Y.)

Dear Judge Cote:

We write on behalf of the Federal Housing Finance Agency ("FHFA") in response to the August 30, 2013 cover letter from Andrew Frankel pertaining to Defendants' proposed sealing/redactions to their Motion to Compel Production of Documents Withheld on the Basis of the Bank Examination and Deliberative Process Privileges.

FHFA concurs in Defendants' proposed redactions of the entirety of Exhibit H, as well as footnote 17 on page 15 of their Memorandum of Law. FHFA does not believe any additional redactions are necessary related to Defendants' recent filing.

Thank you for Your Honor's consideration regarding this matter.

Respectfully submitted,

/s/ Philippe Z. Selendy
Philippe Z. Selendy
(philippeselendy@quinnemanuel.com)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
(212) 849-7000

*Attorney for Plaintiff Federal Housing
Finance Agency in FHFA v. JP Morgan
Chase & Co., FHFA v. Deutsche Bank AG,
and FHFA v. Goldman, Sachs & Co.*

/s/ Richard A. Schirtzer
Richard A. Schirtzer
(richardschirtzer@quinnemanuel.com)
Adam Abensohn
(adamabensohn@quinnemanuel.com)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010

*Attorney for Plaintiff Federal Housing
Finance Agency in FHFA v. HSBC North
America Holdings, Inc., and FHFA v.
Nomura Holding America, Inc.*

/s/ Christine H. Chung

Christine H. Chung
(christinechung@quinnemanuel.com)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010

*Attorney for Plaintiff Federal Housing
Finance Agency in FHFA v. First Horizon
National Corp., FHFA v. Bank of America
Corp., and FHFA v. Credit Suisse
Holdings (USA), Inc.*

/s/ Eric Bruce

Eric Bruce
(eric.bruce@kobrekim.com)
Steven W. Perlstein
(steven.perlstein@kobrekim.com)
KOBRE & KIM LLP
800 Third Avenue
New York, New York 10022
(212) 488-1203

*Attorneys for Plaintiff Federal Housing
Finance Agency in FHFA v. JPMorgan
Chase & Co., FHFA v. HSBC North
America Holdings Inc., FHFA v. Barclays
Bank Plc, FHFA v. Deutsche Bank AG,
FHFA v. First Horizon National
Corporation, FHFA v. Bank of America
Corporation, FHFA v. Goldman, Sachs
and Co., FHFA v. Credit Suisse Holdings
(USA), Inc., FHFA v. Nomura Holding
America, Inc., FHFA v. Merrill Lynch &
Co., Inc., FHFA v. Ally Financial Inc., and
FHFA v. SG Americas, Inc*

/s/ Manisha M. Sheth

Manisha M. Sheth
(manishasheth@quinnemanuel.com)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010

*Attorney for Plaintiff Federal Housing
Finance Agency in FHFA v. JP Morgan
Chase & Co., FHFA v. Barclays Bank
PLC, and FHFA v. Merrill Lynch & Co.,
Inc.*

/s/ Kanchana Wangkeo Leung

Kanchana Wangkeo Leung
(kleung@kasowitz.com)
KASOWITZ, BENSON, TORRES &
FRIEDMAN, LLP
1633 Broadway
New York, New York 10019

*Attorney for Plaintiff Federal Housing
Finance Agency in FHFA v. Ally
Financial Inc., FHFA v. Morgan Stanley,
and FHFA v. SG Americas, Inc.*

cc: All Counsel of Record